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November 18, 2019

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Hines v. Roc-A-Fella Records, Inc. et al.*, 19-cv-04587

Dear Judge Oetken:

We are the attorneys for Defendant Sony Music Entertainment (“SME”) in the above-referenced action.

SME joins in the objections, by its co-defendants, to Plaintiff’s submission of yet another amended complaint – his fourth try – and the report by Joe Bennett Music Service.

Plaintiff’s motion for leave to amend should be denied and neither of the referenced materials should be considered, in accordance with this Court’s previous ruling. [Dkt. No. 69 (“[T]he Court will simply disregard any improper material.”).]

Respectfully submitted,

/s/ *Jonathan D. Davis*

Jonathan D. Davis

cc: All counsel
(Via ECF)